

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

<p><b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b></p>	<p><b>MDL No. 2875</b></p>
<p><b>THIS DOCUMENT RELATES TO ALL CASES</b></p>	<p><b>HON. ROBERT B. KUGLER</b></p>

**NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

TO: **Clem C. Trischler, Esq.,  
PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI, LLP  
38<sup>TH</sup> Floor, One Oxford Centre  
Pittsburgh, Pennsylvania 15219**  
*Attorneys for Defendants Mylan Pharmaceuticals Inc. (hereinafter "Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Lance Molnar, Senior Director, Pharmacology and Toxicology, on February 16, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Pietragallo Gordon Alfano Bosick & Raspanti, LLP, 38<sup>th</sup> Floor, One Oxford Center, Pittsburgh, Pennsylvania 15219, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEYS FOR PLAINTIFFS:**

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

January 28, 2021

**PLAINTIFFS' CO-LEAD COUNSEL**

By: /s/John R. Davis  
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**EXHIBIT A**

**30(B)(6) TOPICS**

*On behalf of Mylan Pharmaceuticals Inc.:*

*Process Development*

27. Any evaluation conducted by or on behalf of Mylan with regard to health or safety issues arising from the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for Mylan's valsartan API (regardless of intended sale location) in any facility that manufactured Mylan's valsartan API for sale in the United States.

28. Mylan's evaluation and knowledge of the risk of the creation of nitrosamines including NDMA and NDEA as a result of the manufacturing process for Mylan's valsartan API.

29. Mylan's evaluation and knowledge of the risk of using recovered or recycled solvents in the Tetrazole ring formation step, in the manufacturing process for Mylan's valsartan API.

30. Mylan's evaluation and knowledge of the health risks of nitrosamines including NDMA and NDEA, including but not limited to as a contaminant of Mylan's valsartan API.

31. Mylan's evaluation and knowledge of the health risks of nitrosamines including NDMA and NDEA, including but not limited to as a contaminant of Mylan's valsartan finished dose.

**EXHIBIT B**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Lance Molnar.
2. The complete production of Lance Molnar's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 28, 2021, I caused the foregoing document to be electronically filed with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

**PLAINTIFFS' CO-LEAD COUNSEL**

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